

REMARKS

In the above-mentioned Office Action, all of the pending claims, claims 1-6, were rejected under Section 103(a) over the combination of *Pedlar* and *Vialen*.

In the rejection, the Examiner asserted that *Pedlar* discloses the claimed invention but for disclosure of a new C-RNTI element. And, the Examiner relies upon the *Vialen* for disclosing a new C-RNTI element. The Examiner asserts that it would have been obvious to improve *Pedlar* with the use of a new C-RNTI element as taught by *Vialen*.

This rejection of the claims is respectfully traversed for reasons that follow.

As recited in independent claim 1, the present invention discloses, and claims, a method of responding to a Cell or URA Update Confirm message received in a user equipment of a communication system. And, the method is recited to include: receiving a Cell or URA Update Confirm message; determining whether the message places the user equipment in a state that requires a response prior to entering the state; determining whether the message contains a C-RNTI element; and, in the event that a response is required and that the message contains a new C-RNTI element, using the element to send a response message prior to entering the state. As the method is for responding to the message received in a user equipment, the message is undertaken at, e.g., a handheld device rather than within the network of the communication system.

While the Examiner relies upon *Pedlar* for showing the recited invention but for the C-RNTI element, review of this reference indicates that *Pedlar* fails to disclose any of the steps recited in claim 1. That is to say, *Pedlar* fails to disclose determining whether the message places the user equipment in a state that requires a response prior to entering the state, determining whether the message contains a C-RNTI element, or, in the event that a response is required and the message contains a C-RNTI element, using the element to send a response message. While specific reliance was placed upon paragraphs 11, 33, and 34 of *Pedlar*, neither these paragraphs, nor elsewhere in the reference,

disclosed, or implied, what action user equipment takes when receiving a Cell Update Confirm message, particularly when the message contains a new C-RNTI element.

Reliance upon *Vialen* is also believed to be misplaced. *Vialen* appears to be concerned with the allocation of a C-RNTI element within a network, that is, before a message is sent to user equipment. The Examiner notes that in column 4, lines 63-67 of *Vialen*, of the use of a new C-RNTI element. *Vialen* is silent, however, as to how the user equipment reacts on the receipt of a Cell or URA Update Confirm message. And, in particular, *Vialen* fails to teach that, on receipt of such a message, the user equipment determines whether the message places the user in the state that requires a response prior to entering the state, nor that the user equipment determines whether the message contains a new C-RNTI element. Yet further, *Vialen* fails to disclose that, in the event that a response is required and that the message contains a new C-RNTI element, the user equipment uses the new C-RNTI element to send a response message. That is to say, *Vialen* fails to disclose that, on receipt by user equipment of a Cell URA Update Confirm message that would typically instruct the user equipment to enter the state of Cell_PCH or URA_PCH, the user equipment looks for a new C-RNTI element in that message and sends a response, prior to entering the state using the new C-RNTI element.

In short, the Applicant believes that *Vialen* neither discloses an identifier allocation message nor the use of a new C-RNTI element relating to operation of the user equipment on receipt of such a message from the network.

No combination of *Pedlar* and *Vialen* can be created that forms the method recited in claim 1. *Vialen* simply fails to disclose a message containing a new C-RNTI element responsive to which user equipment sends a response message.

Newly proposed claim 7 is believed to be patentable for the same reasons. No combination of *Pedlar* and *Vialen* can be formed to create the computer-readable medium recited in claim 7. Support for the recitations of claim 7 are found in the specification, for instance, in paragraphs 26-29.

The dependent claims, which include all the limitations of their parent claim, are believed to be distinguishable over the combination of references for the same reasons as those given with respect to their parent claim.

In light of the foregoing, therefore, the claims, as presently presented, are believed to be in condition for allowance. Accordingly, reexamination and reconsideration for allowance of these claims is respectfully requested. Such early action is earnestly solicited.

Respectfully submitted,

/Robert H. Kelly/

Robert H. Kelly
Registration No. 33,922

SCHEEF & STONE, L.L.P.
5956 Sherry Lane, Suite 1400
Dallas, Texas 75225
Telephone: (214) 706-4201
Fax: (214) 706-4242
robert.kelly@scheefandstone.com